

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**SHARY EVERETT, on behalf of herself and
all others similarly situated,**

Plaintiff,

v.

MCI, INC., a Delaware Corporation,

Defendant.

Chapter 11

**Case No. 02-13533-AJG
(Jointly Administered)**

Case No. 07-9590 (DC)

Adv. No. 07-01792 (AJG)

In re

WORLD COM, INC., et al.

Reorganized Debtors.

MOTION TO ADMIT COUNSEL *PRO HAC VICE*


PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Lydia T. Protopapas, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

Kristin S. Escalante, Esq.
Munger, Tolles & Olson LLP
355 South Grand Avenue, 35th Floor
Los Angeles, CA 90071-1560
Telephone: (213) 683-9100
Facsimile: (213) 683-4070

Kristin S. Escalante is a member in good standing of the California State Bar, the United States District Court for the Central District of California, the United States District Court for the Eastern District of California, the United States District Court for the Northern District of California, the United States District Court for the Southern District of California, and the United

States Court of Appeals for the 9th Circuit. There are no pending disciplinary proceeding against Kristin S. Escalante in any State or Federal court.

Dated: JULY 18, 2008
Houston, Texas

By: 
Lydia T. Protopapas
WEIL, GOTSHAL & MANGES LLP
700 Louisiana, Suite 1600
Houston, Texas 77002
Telephone: (713) 546-5000
Facsimile: (713) 224-9511

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**AFFIDAVIT OF LYDIA T. PROTOPAPAS IN SUPPORT OF
MOTION TO ADMIT COUNSEL *PRO HAC VICE***

Lydia T. Protopapas, being duly sworn, hereby deposes and says as follows:

1. I am a Partner at Weil, Gotshal and Manges LLP, counsel for Defendant, MCI, LLC f/k/a MCI, Inc. and n/k/a Verizon Business Global LLC ("MCI") in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Kristin S. Escalante as counsel *pro hac vice* to represent Defendant in this matter.
2. I was admitted to practice in Texas in 1996 and am also a member in good standing of the Bar of the State of New York, and was admitted to practice law in such bar on January 30, 2008. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Kristin S. Escalante since 2007.

4. Kristin S. Escalante is a Partner at Munger, Tolles & Olson LLP, in Los Angeles, California.
5. I have found Ms. Escalante to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move for the admission of Kristin S. Escalante, *pro hac vice*.
7. I respectfully submit a proposed order granting the admission of Kristin S. Escalante, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to admit Kristin S. Escalante, *pro hac vice*, to represent Defendant in the above-captioned matter, be granted.

Dated: JULY 18, 2008
Houston, Texas

Respectfully submitted,


By: 
Lydia T. Protopapas
WEIL, GOTSHAL & MANGES LLP
700 Louisiana, Suite 1600
Houston, Texas 77002
Telephone: (713) 546-5000
Facsimile: (713) 224-9511

Exhibit A

Proposed Order

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ORDER FOR ADMISSION *PRO HAC VICE*

Upon consideration of the motion of Lydia T. Protopapas, attorney for Defendant, MCI, LLC f/k/a MCI, Inc. and n/k/a Verizon Business Global LLC ("MCI") and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Kristin S. Escalante, Esq.
Munger, Tolles & Olson LLP
355 South Grand Avenue, 35th Floor
Los Angeles, CA 90071-1560
Telephone: (213) 683-9100
Facsimile: (213) 683-4070
Kristin.Escalante@mto.com

is admitted to practice *pro hac vice* as counsel for Defendant, MCI, LLC f/k/a MCI, Inc. and n/k/a Verizon Business Global LLC ("MCI") in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of

attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated:
New York, New York

United States District Court Judge

CERTIFICATE OF SERVICE

I, Rene A. Olvera, certify that I caused a true and correct copy of the foregoing Motion to Admit Counsel *Pro Hac Vice* to be served upon the party listed below via First-Class Mail on JULY 18, 2008.



Rene A. Olvera

A.J. De Bartolomeo
Aaron M. Sheanin
Gerard Gibbs LLP
601 California Street, 14th Floor
San Francisco, CA 94108
ajd@girardgibbs.com
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THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

July 10, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, KRISTIN SHERRATT ESCALANTE, #169635 was admitted to the practice of law in this state by the Supreme Court of California on January 17, 1994; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in cursive script, appearing to read "Kath Lambert".

Kath Lambert
Custodian of Membership Records

United States District Court

Central District of California

CERTIFICATE OF GOOD STANDING

I, SHERRI R. CARTER, Clerk of this Court, certify that

Kristin S. Escalante, Bar No. 169635



was duly admitted to practice in this Court on October 20, 1997

is in good standing as a member of the Bar of this Court.

Dated at Los Angeles, California.

on July 15, 2008
DATE

SHERRI R. CARTER, CLERK

By  
Lupe Thrasher, Deputy Clerk